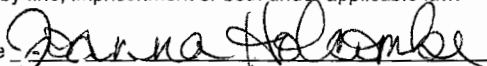


United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address GLB POOL & SPA (AN ARCH CHEMICALS, INC. BUSINESS) 1200 BLUEGRASS LAKES PARKWAY ALPHARETTA, GA 30004		2. Case # and Name 0569 - Trichloro-s-triazinetrione Chemical # and Name: 081405 Trichloro-s-triazinetrione			3. Date and Type of DCI and Number 17-Jun-2019 GENERIC ID # GDCI-081405-1804				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Applicator Exposure Data Requirements (Conventional Chemical)								
875.1400	Inhalation exposure--indoor (17, 18, 29, 30, 33)	Y				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	24	6
875.1700	Product Use Information (17, 18, 29, 30)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	TEP	12	6
	Environmental Fate Data Requirements (Conventional Chemical)								
835.1230	Sediment and soil absorption/desorption for parent and degradates (2, 7)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
835.4300	Aerobic aquatic metabolism (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	24	6
835.4400	Anaerobic aquatic metabolism (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	24	6
	Nontarget Plant Protection Data Requirements (Conventional Chemical)								
850.4100	Seedling Emergence and Seedling Growth (1, 28)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.4150	Vegetative Vigor (1, 28)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date		
Signature and Title of Company's Authorized Representative:  Regulatory Specialist							September 17, 2019		
12. Name of Company Innovative Water Care, LLC D/B/A GLB Pool & Spa							13. Phone Number 678-624-5886		

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			1	2	3				
	Nontarget Plant Protection Data Requirements (Conventional Chemical) 850.4400 Aquatic Plant Toxicity Using Lemna spp (2, 19, 22)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
	Post-Application Exposure Data Requirements (Conventional Chemical) 875.2300 Indoor surface residue dissipation (10, 32, 33)	Y				R,S,T,U,V,W,X,Y,Z,CC,DD	TEP	24	9
	Residue Chemistry Data Requirements for Food Uses (Conventional Chemical) 860.1460 Food handling (11, 14, 33)	Y				R,S,T,U,V,W,X,Y,Z,CC,DD	TEP	24	6
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical) 850.1010 Aquatic invertebrate acute toxicity, test, freshwater daphnids (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
	850.1025 Oyster acute toxicity test (shell deposition) (2, 6)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6

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			1	2	3				
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)								
850.1035	Mysid acute toxicity test (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.1055	Bivalve acute toxicity test (embryo larval) (2, 6)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.1075	Fish acute toxicity test, freshwater and marine (2, 8, 13)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	TEP	12	6
850.1300	Daphnid chronic toxicity test (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.1350	Mysid chronic toxicity test (2)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.1400	Fish early-life stage toxicity test (2, 3)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
810.2600	Disinfectants and Sanitizers for Use in Water (4, 5, 33)	Y				R,S,T,U,V,W,X,Y,Z,CC,DD	TGAI	24	6
835.3110	Ready biodegradability (2, 9, 27)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6

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			1	2	3				
835.3220	Porous pot test (2, 9, 26)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
835.3240	Simulation Test-Aerobic Sewage Treatment-Activated Sludge (2, 9, 25)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
835.3280	Simulation Tests to Assess the Biodegradability of Chemicals (2, 9, 24)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.3300	Modified Activated Sludge, Respiration Inhibition Test (2, 9, 15, 23)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.4500	Algal Toxicity (2, 21, 31)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
850.4550	Cyanobacteria (Anabaena flos-aquae) Toxicity (2, 20, 31)	N				R,S,T,U,V,W,X,Y,Z,CC,DD	Degr	12	6
SS-Migration	Migration studies (12, 16, 33)	Y				R,S,T,U,V,W,X,Y,Z,CC,DD	ROC	24	9

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 0569 - Trichloro-s-triazinetriene

DCI Number: GDCI-081405-1804

Key: [Degr] = Degradate; [d-EP] = diluted End-use product; [EP] = End-use product; [MET] = Plant metabolite; [MP] = Manufacturing-use product; [PAI] = Pure Active Ingredient; [PAIRA] = Pure active ingredient radio-labelled; [RAMET] = Radio-labeled plant metabolite; [ROC] = Residue of Concern; [TEP] = Typical end-use product; [TGAI] = Technical grade of the active ingredient; [TW] = Treated wood

Use Categories Key:

R - Agricultural premises and equipment

S - Food handling/storage establishments premises and equipment

T - Commercial, institutional and industrial premises and equipment

U - Residential and public access premises

V - Medical premises and equipment

W - Human drinking water systems

X - Materials preservatives

Y - Industrial processes and water systems - once through

CC - Swimming pools

DD - Aquatic areas

Z - Industrial processes and water systems - not once through

Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

- 1 Use sites triggering the data requirement: Industrial Process and Water Treatment - Cooling Tower and Swimming Pools and Water Beds; Hard Surfaces Disinfectants and Sanitizers: Down-the-Drain (DtD) residential and industrial; Laundry Products: DtD residential and commercial; Material Preservatives: DtD Production and In-Service; not needed for in-can material preservatives and floriculture patch.
- 2 Use sites triggering the data requirement: Industrial Process and Water Treatment - Cooling Tower and Swimming Pools and Water Beds; Hard Surfaces Disinfectants and Sanitizers: Down-the-Drain (DtD) residential and industrial; Laundry Products: DtD residential and commercial; Material Preservatives: DtD Production and In-Service.
- 3 This study is required for the more acutely sensitive of the freshwater and estuarine/marine fish species tested.
- 4 This study is needed for the following use sites: swimming pools.
- 5 This study is for a swimming pool field test consistent with the 2012 OCSP Product Performance Test Guideline Chapter 810.2600 - Disinfectants and Sanitizers for Use in Water, available at <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0150-0026>.
- 6 This DCI requires either GLN 850.1025 or GLN 050.1035.
- 7 This DCI requires either GLN 835.1230 or OECD 106.

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

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- 8 This DCI requires GLN 850.1075 for both freshwater (warm and cold water species) fish and for estuarine/marine fish.
- 9 The results of the Activated Sludge Respiration Inhibition Test (ASRI), GLN 850.3300, will determine which of the four biodegradation tests is/are required.
- If the ASRI test EC50 is less than or equal to 20 mg/L, then either the (i) Biodegradation in Activated Sludge Study, GLN 835.3280 or (ii) Simulation Test - Aerobic Sewage Treatment: A. Activated Sludge Units, GLN 835.3240, or (iii) the Porous Pot Test, GLN 835.3220 is required. If the ASRI test EC50 is greater than 20 mg/L, then the registrant must conduct either: (i) Ready Biodegradability, GLN 835.3110, or (ii) a) Biodegradation in Activated Sludge, or b) Simulation Test - Aerobic Sewage Treatment: A. Activated Sludge Units, or c) the Porous Pot Test.
- If the Ready Biodegradability study is conducted and passes, then no further testing is required. If, however, the antimicrobial fails the Ready Biodegradability study, then the (i) Biodegradation in Activated Sludge, or (ii) Simulation Test - Aerobic Sewage Treatment: A. Activated Sludge Units, or (iii) the Porous Pot study is required.
- 10 Study is needed for the following use sites: household floors.
- 11 Study is needed for the following use sites: food processing, dairy, and public eating establishments.
- 12 Study is needed for the following use sites: adhesives and pulp/paper mill slime use.
- 13 Results from a study using one estuarine/marine fish species must be submitted to satisfy this requirement. Except for the industrial processes and water system uses, testing of a second freshwater species (cold or warm water) may be waived if isocyanuric acid is not stable and the median lethal concentration (LC50) in the first species tested is >1 ppm.
- 14 Residue chemistry data are anticipated to be needed to determine dietary exposure to cyanuric acid/isocyanuric acid following sanitization of food contact surfaces of food processing plants (including dairies) and food-handling facilities (including public eating places).
- 15 OECD Test Guideline 209 can also be used as guidance for this study, available online at <http://www.oecd-ilibrary.org/content/book/9789264070080-en>.
- 16 Migration of cyanuric acid/isocyanuric acid from preserved adhesive to food and from paper/paperboard to food following the slime use.
- 17 It may be possible to use proprietary surrogate exposure data if data compensation issues can be addressed.
- 18 If the labels are modified to require automatic foggers in place of hand held foggers, then the study of hand held fogging exposures would not be expected to be needed.
- 19 For all use sites described in footnote 2, one definitive test is required for duckweed (*Lemna gibba* or *L. minor*).
- 20 For all use sites described in footnote 2, one definitive test is required for *Anabaena flos-aquae*.
- 21 For all use sites described in footnote 2, definitive tests are required for three species: green alga (*Pseudokirchneriella subcapitata* [= *Selenastrum capricornutum*]) and two diatoms (*Navicula pelliculosa* and *Skeletonema costatum*).
- 22 Except for industrial process and water treatment uses, a use may be eligible for data waiver if the aquatic plant NOAEC results are all greater than or equal to 1 ppm.
- 23 EPA published draft guidance under guideline 850.6800 and has since published final guidance for this study under guideline 850.3300: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0154-0021>.
- 24 EPA has a published final guideline for this study: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0036>. The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
- 25 EPA has a published final guideline for this study: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0034>. The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
- 26 EPA has a published final guideline for this study: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0024>. The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
- 27 EPA has a published final guideline for this study: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2009-0152-0017>. The biodegradation study required is based on results of an Activated Sludge Respiration Inhibition test.
- 28 Data may be waived for uses where environmental exposure concentrations will be less than the aquatic plant growth Tier II (850.4400, 850.4500, and 850.4550) no observable adverse effect concentration (NOAEC) values.

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- 29 Applicable Residential Handler Exposure Scenarios: (1) Open pour liquids, granules and powder for pool treatment; (2) Mop, wipe and trigger spray for hard surface disinfection; and (3) Brush, roller and spray application of preserved paints.
- 30 Applicable Occupational Handler Exposure Scenarios: (1) Open pour liquids, granules and powder for hard surface disinfection and pool treatment; (2) Open pour granules for material preservation; (3) Mop, wipe and trigger spray for hard surface disinfection; (4) Hand wand spray disinfection of egg and food processing plants; (5) Fogging disinfection of egg and food processing plants; and (6) Brush, roller and spray application of preserved paints.
- 31 All uses footnoted with marine diatom and freshwater diatom data for material preservative uses, hard surface disinfection and sanitization uses, and floriculture use may be eligible for data waiver if green algae (*Selenastrum capricornutum*) NOAEC results are greater than or equal to 1 ppm.
- 32 A waiver may be requested for all applications if a residue screening level default at 100% of the application rate does not trigger risk concerns. For Hard Surface Flooring, only: If surface residue data are not available, then the standard assumption of 100 percent transferable surface residue will be used which might overestimate the risk.
- 33 A protocol must be approved by the Agency prior to the initiation of the study.